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ORACLE AMERICA, INC.

20 UNITED STATES DISTRICT COURT  
21 NORTHERN DISTRICT OF CALIFORNIA  
22 SAN FRANCISCO DIVISION

23 ORACLE AMERICA, INC.  
24 v.  
Plaintiff,  
25 GOOGLE INC.  
Defendant.

Case No. CV 10-03561 WHA  
**DECLARATION OF NATHAN  
SHAFFER IN SUPPORT OF  
ORACLE'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL**  
Dept.: Courtroom 8, 19th Floor  
Judge: Honorable William H. Alsup

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1 I, Nathan Shaffer, declare and state as follows:

2       1. I am a member of the State Bar of California, admitted to practice before this  
 3 Court, and an associate with the law firm of Orrick, Herrington & Sutcliffe LLP (“Orrick”),  
 4 attorneys of record for plaintiff Oracle America, Inc. (“Oracle”). I am familiar with the events,  
 5 pleadings and discovery in this action and, if called upon as a witness, I could and would testify  
 6 competently to the matters stated herein of my own personal knowledge.

7       2. I submit this declaration in support of Oracle’s Administrative Motion to File  
 8 Under Seal.

9       3. Portions of Plaintiff Oracle America, Inc.’s Opposition to Motion for Finding of  
 10 Civil Contempt And For Sanctions summarize, quote from, or reproduce materials that have been  
 11 designated by Google as “CONFIDENTIAL” or ”“HIGHLY CONFIDENTIAL – ATTORNEY’S  
 12 EYES ONLY” pursuant to the Protective Order. *See* ECF No. 66. Specifically, the redactions  
 13 marked on page 2, lines 7-11 and 12-13 have been designated pursuant to the Protective Order.

14       4. Portions of Exhibit A to the Declaration of Annette L. Hurst dated August 8, 2016  
 15 (“Hurst Decl.”) have been designated by Google as “CONFIDENTIAL” or “HIGHLY  
 16 CONFIDENTIAL – ATTORNEY’S EYES ONLY” pursuant to the Protective Order. *See* ECF  
 17 No. 66. Specifically, the redactions marked on pages 13-15; page 16, lines 1-23; page 18; and  
 18 page 19, lines 1-7 have been designated pursuant to the Protective Order.

19       5. Portions of Exhibit B to the Hurst Decl. have been designated by Google as  
 20 “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY” pursuant  
 21 to the Protective Order. *See* ECF No. 66. Specifically, the redactions marked on page 207, lines  
 22 1-25; and 208, lines 1-25 have been designated pursuant to the Protective Order.

23       6. Portions of Exhibit C to the Hurst Decl. have been designated by Google as  
 24 “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY” pursuant  
 25 to the Protective Order. *See* ECF No. 66. Specifically, the redactions marked on page 118, lines  
 26 3-6 and 24-25; and page 119, lines 1, 12, and 19-20 have been designated pursuant to the  
 27 Protective Order.

28 I declare under penalty of perjury under the laws of the United States that the foregoing is

1 true and correct.

2 Executed this 8th day of August, 2016, at San Francisco, CA.

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Nathan Shaffer